

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR
BENGULESCU, GERALD BEZEMS,
SCOTT CROCKETT, RIFAT
GORENER, CHRISTOPHER LESIEUR,
LAWRENCE MARCUS, and MIKHAIL
SULEYMANOV, individually and on
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,
BAVARIAN MOTOR WORKS, and
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(SCM)

CLASS ACTION

**PLAINTIFFS' UNOPPOSED MOTION FOR AN ORDER GRANTING
PRELIMINARY APPROVAL OF THE CLASS ACTION SETTLEMENT
AND CERTIFYING A SETTLEMENT CLASS**

For the reasons set forth in the Memorandum of Law submitted herewith, Plaintiffs respectfully request that this Court enter an Order: (1) conditionally certifying a class action with respect to the claims against Defendants pursuant to Federal Rules of Civil Procedure Rules 23(a) and 23(b)(3) for the purpose of effectuating a class action settlement of the claims against Defendants; (2) preliminarily approving the settlement; (3) directing notice to Settlement Class Members consistent with the notice plan in the Settlement Agreement; (4)

appointing McCune Wright Arevalo, LLP and Wagstaff & Cartmell LLP as Settlement Class Counsel; and (5) scheduling a final approval hearing.

Dated: May 4, 2018

Respectfully submitted,

McCune Wright Arevalo LLP

By: //s// Matthew D. Schelkopf

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Proposed Settlement Class Counsel

CERTIFICATE OF SERVICE

I, Matthew D. Schelkopf, hereby certify that on May 4, 2018, the foregoing motion and its accompanying materials were filed via the Court's ECF filing system, thereby electronically serving it on all counsel of record.

/s/ Matthew D. Schelkopf
Matthew D. Schelkopf